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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

11 JOHN HANCOCK LIFE )  
12 INSURANCE COMPANY (U.S.A.), ) Case No. 2:13-cv-00557-APG-GWF  
13 a Michigan Corporation, )  
14 Plaintiff, )  
15 vs. )  
16 KRISTINE LEE JACOBS, an )  
17 individual; KRISTINE LEE JACOBS, )  
18 as guardian of B.W., a minor; GINA )  
19 NEFF, an individual; DUANE )  
20 JACOBSEN, an individual; Does I to )  
X, and roe Corporations X to XX, )  
Defendants. )  
)

**STIPULATION AND ORDER**  
**TO RELEASE INTREPLEADED FUNDS**  
**AND DISMISS ACTION WITH**  
**PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED by and between the parties Kristine Lee Jacobs f/k/a Kristine Lee Wood ("Kristine"), and Edward Kainen as the appointed guardian ad litem (the "GAL") for Brandon Charles Wood ("B.W.") together with Kristine, the "Parties", that the funds interpleaded in this matter be disbursed to a blocked account for the benefit of B. W., a minor, and that the above-captioned interpleader action be dismissed with prejudice.

WHEREAS, Plaintiff John Hancock Life Insurance (U.S.A.) ("John Hancock") brought this action to determine the entitlement to insurance proceeds relating to a life insurance policy issued to Albert L. Wood Jr. ("the Proceeds").

WHEREAS, John Hancock deposited the Proceeds with the Court pursuant to this Court's Order (Doc. No. 24) and John Hancock was subsequently dismissed from this matter pursuant to the Court's Order granting Plaintiff's Renewed Motion for Discharge (Doc. No. 37);

WHEREAS, Defendant Duane Jacobson, is deceased and is not a party to this action pursuant to the Notice of Passing of Defendant Duane Jacobsen (Doc. No. 36);

WHEREAS, the clerk has entered default as to Defendant Gina Neff (Doc. No. 27);

WHEREAS, Kristine and B.W. are the only remaining parties to this action;

WHEREAS, B.W. is a minor and this court appointed Edward Kainen to serve as a guardian ad litem ("GAL") for the minor child in this action (Doc. No. 44);

WHEREAS, an Order was entered by this Court on January 8, 2015 allowing for a blocked account to be established for the benefit of Brandon Charles Wood with the intent that the interpled funds would be disbursed to the same. (Doc. No. 47);

WHEREAS, Kristine filed proof of a blocked account with this Court on January 30, 2015. (Doc. No. 48);

NOW THEREFORE, the Parties stipulate and agree that as soon as practicable, the Proceeds, less the GAL's reasonable attorneys' fees and costs totaling \$1,970.00 (the "Net Proceeds") as set forth in the billing statement attached hereto as **Exhibit 1**, shall be disbursed into the blocked account established for the benefit of Brandon Charles Wood pursuant to Doc. No. 47 and Doc. No. 48.

Attached hereto as **Exhibit 2** are documents from Bank of American containing the account number and ACH Routing Number to facilitate the transfers of interplead funds from the Court into the blocked account.<sup>1</sup>

FURTHER, the Parties stipulate and agree that this matter be dismissed with prejudice.

<sup>1</sup> The banking documents are being filed concurrent with a motion to seal the same as there is no public interest and/or right to the account information contained therein.

1 FURTHER, the parties further agree that Edward Kainen's appointment as B.W.'s GAL  
2 shall terminate immediately upon entry of the Order dismissing this action.

3 IT IS HEREBY STIPULATED.

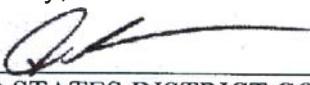
4 GREENBERG TRAURIG, LLP

5  Date: 2/2/15  
6 Kara B. Hendricks, Esq. (NV Bar 7743)  
7 Colin Seale, Esq. (NV Bar 13017)  
8 3773 Howard Hughes Parkway  
Suite 400 North  
Las Vegas, Nevada 89169  
Counsel for Defendant Kristine  
Lee Jacobs

KAINEN LAW GROUP, PLLC

6  Date: 1/30/15  
7 Edward L. Kainen, Esq. (NV Bar 5029)  
8 3303 Novat Street, Suite 200  
Las Vegas, Nevada 89129  
Counsel and Guardian Ad Litem for the  
Minor Child B.W.

10  
11  
12  
13  
14 **ORDER**

15 IT IS SO ORDERED this 2nd day of February, 2015.  
16   
17 UNITED STATES DISTRICT COURT JUDGE

18 Respectfully submitted by:

19 GREENBERG TRAURIG, LLP

20   
21 Kara B. Hendricks, Esq. (NV Bar 7743)  
22 Colin Seale, Esq. (NV Bar 13017)  
23 3773 Howard Hughes Parkway  
Suite 400 North  
24 Las Vegas, Nevada 89169  
Counsel for Defendant Kristine  
Lee Jacobs

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## EXHIBIT 1

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3303 Novat Street  
Las Vegas, NV 89129

T: (702) 823-4900 F: (702) 823-4488

■■

Brandon Woods  
NV

October 30, 2014

File #: 369-001  
Inv #: 5185

RE: Woods, Brandon - GAL

DATE	DESCRIPTION
Aug-01-14	Review file and documents from case in anticipation of telephone conference with lawyers for Kristine Jacobs; Telephone conference with lawyers for Kristine Jacobs regarding outline of issues, discussion, issues ripe for consideration;
Aug-11-14	Prepare Notice of Appearance
Aug-12-14	Conference with Kristine Jacobs (mother of client) and Brandon Woods only
Aug-15-14	Prepare letter to adverse attorney inviting meeting to discuss case; Exchange email with adverse attorney regarding setting settlement discussions
Aug-26-14	Outline issues for upcoming meeting with adverse attorney; Exchange email with opposing counsel regarding upcoming meeting, inability of opposing counsel to attend, and request to conduct teleconference; Telephone conference with adverse attorney regarding discussion of possible avenues for resolution of case without litigation
Aug-28-14	Prepare draft of letter to Kara Hendricks regarding results of meeting and discussions with minor child's mother
Oct-27-14	Read and study email from adverse attorney regarding their clients desire to withdrawal request and drop litigation;

#### Summary of Time

	Hours	Rate	Total Amt
Edward Kainen	3.70	\$500.00	\$1,850.00
Carol L. Navarro	0.60	\$200.00	\$120.00
Total Hours:	4.30	Total Fees:	\$1,970.00

Total Fees & Disbursements	\$1,970.00
Balance Now Due	\$1,970.00
<hr/>	
Trust Balance	\$0.00

**PAYMENT IS DUE 15 DAYS FROM THE DATE OF THIS INVOICE**  
*Late payments are subject to interest and finance charges*

*\*\*A credit card payment form is included for your convenience \*\**

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## EXHIBIT 2

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**EXHIBIT 2 FILED UNDER SEAL**